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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION

Case 3:23-md-03084-CRB

MDL No. 3084

**ATTORNEY WALT CUBBERLY'S
 DECLARATION IN SUPPORT OF
 PLAINTIFFS' MEMORANDUM OF LAW
 IN OPPOSITION TO DEFENDANTS'
 MOTION FOR ENTRY OF (1) ORDER TO
 SHOW CAUSE AND (2) CASE
 MANAGEMENT ORDER**

This Document Relates to:

Judge: Hon. Charles R. Breyer

Courtroom: 6 – 17th Floor

*WHB 1339 v. Uber Technologies, Inc., et
 al., No. 3:24-cv-05292*

*WHB 645 v. Uber Technologies, Inc., et al.,
 No. 3:24-cv-05356*

*WHB 492 v. Uber Technologies, Inc., et al.,
 No. 3:24-cv-05470*

1 *WHB 1969 v. Uber Technologies, Inc., et*
2 *al., No. 3:24-cv-05483*

3 *WHB 1484 v. Uber Technologies, Inc., et*
4 *al., No. 3:24-cv-05779*

5 *WHB 375 v. Uber Technologies, Inc., et al.,*
6 *No. 3:24-cv-05781*

7 *WHB 1604 v. Uber Technologies, Inc., et*
8 *al., No. 3:24-cv-05958*

9 *WHB 1273 v. Uber Technologies, Inc., et*
10 *al., No. 3:24-cv-05950*

11 *WHB 885 v. Uber Technologies, Inc., et al.,*
12 *No. 3:24-cv-05952*

13 *WHB 1381 v. Uber Technologies, Inc., et*
14 *al., No. 3:24-cv-05603*

15 *WHB 505 v. Uber Technologies, Inc., et al.,*
16 *No. 3:24-cv-05709*

17 *WHB 2030 v. Uber Technologies, Inc., et*
18 *al., No. 3:25-cv-01092*

19 *WHB 2063 v. Uber Technologies, Inc., et*
20 *al., No. 3:25-cv-01099*

21 *WHB 2064 v. Uber Technologies, Inc., et*
22 *al., No. 3:25-cv-01101*

23 *WHB 2066 v. Uber Technologies, Inc., et*
24 *al., No. 3:25-cv-01121*

25 *WHB 2067 v. Uber Technologies, Inc., et*
26 *al., No. 3:25-cv-01122*

27 *WHB 2069 v. Uber Technologies, Inc., et*
28 *al., No. 3:25-cv-01124*

WHB 2071 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01130

WHB 2072 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01140

WHB 2075 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01148

WHB 2076 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01149

1 *WHB 2078 v. Uber Technologies, Inc., et*
2 *al., No. 3:25-cv-01152*

3 *WHB 2081 v. Uber Technologies, Inc., et*
4 *al., No. 3:25-cv-01161*

5 *WHB 2082 v. Uber Technologies, Inc., et*
6 *al., No. 3:25-cv-01177*

7 *WHB 2084 v. Uber Technologies, Inc., et*
8 *al., No. 3:25-cv-01179*

9 *WHB 2085 v. Uber Technologies, Inc., et*
10 *al., No. 3:25-cv-01183*

11 *WHB 2036 v. Uber Technologies, Inc., et*
12 *al., No. 3:25-cv-01180*

13 *WHB 2038 v. Uber Technologies, Inc., et*
14 *al., No. 3:25-cv-01196*

15 *WHB 2042 v. Uber Technologies, Inc., et*
16 *al., No. 3:25-cv-01206*

17 *WHB 2043 v. Uber Technologies, Inc., et*
18 *al., No. 3:25-cv-01207*

19 *WHB 2037 v. Uber Technologies, Inc., et*
20 *al., No. 3:25-cv-01189*

21 *WHB 2044 v. Uber Technologies, Inc., et*
22 *al., No. 3:25-cv-01209*

23 *WHB 2046 v. Uber Technologies, Inc., et*
24 *al., No. 3:25-cv-01213*

25 *WHB 2048 v. Uber Technologies, Inc., et*
26 *al., No. 3:25-cv-01216*

27 *WHB 2051 v. Uber Technologies, Inc., et*
28 *al., No. 3:25-cv-01226*

WHB 2052 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01229

WHB 2053 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01237

WHB 2054 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01244

WHB 2056 v. Uber Technologies, Inc., et
al., No. 3:25-cv-01246

1 *WHB 2057 v. Uber Technologies, Inc., et*
2 *al., No. 3:25-cv-01247*

3 *WHB 2059 v. Uber Technologies, Inc., et*
4 *al., No. 3:25-cv-01255*

5 *WHB 491 v. Uber Technologies, Inc., et al.,*
No. 3:24-cv-05268

6 *WHB 644 v. Uber Technologies, Inc., et al.,*
7 *No. 3:24-cv-05272*

8 *WHB 1348 v. Uber Technologies, Inc., et*
9 *al., No. 3:24-cv-05669*

10 *WHB 1556 v. Uber Technologies, Inc., et*
11 *al., No. 3:24-cv-05986*

12 I, Walt Cubberly, declare as follows:

- 13 1. I am an attorney at Williams Hart & Boundas LLP admitted to practice before the courts
14 of the State of California. I am one of the counsels of record for all filed WHB claimants.
15 I have personal knowledge of the matters set forth herein, and if called to testify, I would
16 testify competently as to the information below:
- 17 2. This declaration is made in support of the Opposition to Defendants' Motion for Entry of
18 (1) Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts
19 Should Not Be Dismissed With Prejudice and (2) a Case Management Order Addressing
20 Certain Plaintiffs Who Have Not Submitted Receipts.
- 21 3. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
22 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
23 1882, WHB 491 on August 21, 2024. See **Exhibit A** to Defendants' Motion for Entry of
24 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
25 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
26 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
27 Vartain at paragraph 37, attaching **Exhibit 25**, a spreadsheet containing the names of 90
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plaintiffs who did not produce a bona fide ride receipt in the litigation. The spreadsheet also contains the following information from all 45 WHB Plaintiffs' submitted Uber Ride Information Forms: Plaintiff Id Number; Name (redacted); Firm Name; Date of Uber Ride Information Form; Why the Ride Receipt is Unavailable, Accountholder Name, email address, and phone number (all redacted), Approximate Date of Ride; Approximate Starting Address of Ride (redacted); Approximate Ending Address of Ride (redacted); Any Other Information That May Assist Defendants in Identifying Ride; If Items 2 Through 6 Cannot Be Provided, Explanation as to Why Information is Not Readily Ascertainable.

4. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID1883, WHB 644 on August 21, 2024. See **Exhibit A** to Defendants' Motion for Entry of (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

5. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID1889, WHB1339 on August 21, 2024. See **Exhibit A** to Defendants' Motion for Entry of (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

- 1 6. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
2 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
3 1928, WHB 645 on August 23, 2024. See **Exhibit A** to Defendants' Motion for Entry of
4 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
5 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
6 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
7 Vartain at paragraph 37, attaching **Exhibit 25**.
8
- 9 7. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
10 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
11 1949, WHB 492 on August 23, 2024. See **Exhibit A** to Defendants' Motion for Entry of
12 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
13 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
14 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
15 Vartain at paragraph 37, attaching **Exhibit 25**.
16
- 17 8. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
18 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
19 1984, WHB 1969 on August 26, 2024. See **Exhibit A** to Defendants' Motion for Entry of
20 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
21 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
22 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
23 Vartain at paragraph 37, attaching **Exhibit 25**.
24
- 25 9. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
26 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
27 2066, WHB 1484 on August 26, 2024. See **Exhibit A** to Defendants' Motion for Entry of
28

(1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

10. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID 2067, WHB 375 on August 26, 2024. See **Exhibit A** to Defendants' Motion for Entry of (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

11. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID 2079, WHB 1604 on August 26, 2024. See **Exhibit A** to Defendants' Motion for Entry of (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

12. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID 2127, WHB 1273 on August 26, 2024. See **Exhibit A** to Defendants' Motion for Entry of (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order

1 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
2 Vartain at paragraph 37, attaching **Exhibit 25**.

3 13. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
4 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
5 2128, WHB 885 on August 26, 2024. See **Exhibit A** to Defendants' Motion for Entry of
6 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
7 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
8 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
9 Vartain at paragraph 37, attaching **Exhibit 25**.

10 14. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
11 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
12 2133, WHB 1381 on August 26, 2024. See **Exhibit A** to Defendants' Motion for Entry of
13 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
14 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
15 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
16 Vartain at paragraph 37, attaching **Exhibit 25**.

17 15. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
18 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
19 2174, WHB 1381 on August 27, 2024. See **Exhibit A** to Defendants' Motion for Entry of
20 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
21 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
22 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
23 Vartain at paragraph 37, attaching **Exhibit 25**.

1 16. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
2 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
3 2180, WHB 1556 on August 27, 2024. See **Exhibit A** to Defendants' Motion for Entry of
4 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
5 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
6 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
7 Vartain at paragraph 37, attaching **Exhibit 25**.
8

9 17. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
10 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
11 2186, WHB 505 on August 27, 2024. See **Exhibit A** to Defendants' Motion for Entry of
12 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
13 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
14 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
15 Vartain at paragraph 37, attaching **Exhibit 25**.
16

17 18. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
18 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
19 2850, WB 2060 on February 4, 2025. See **Exhibit A** to Defendants' Motion for Entry of
20 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
21 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
22 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
23 Vartain at paragraph 37, attaching **Exhibit 25**.
24

25 19. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
26 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
27 2850, WHB 2060 on February 4, 2025. See **Exhibit A** to Defendants' Motion for Entry of
28

1 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
2 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
3 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
4 Vartain at paragraph 37, attaching **Exhibit 25**.

5
6 20. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
7 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
8 2854, WHB 2063 on February 4, 2025. See **Exhibit A** to Defendants' Motion for Entry of
9 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
10 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
11 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
12 Vartain at paragraph 37, attaching **Exhibit 25**.

13
14 21. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
15 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
16 2855, WHB 2064 on February 4, 2025. See **Exhibit A** to Defendants' Motion for Entry of
17 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
18 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
19 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
20 Vartain at paragraph 37, attaching **Exhibit 25**.

21
22 22. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
23 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
24 2857, WHB 2066 on February 4, 2025. See **Exhibit A** to Defendants' Motion for Entry of
25 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
26 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
27
28

1 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
2 Vartain at paragraph 37, attaching **Exhibit 25**.

3 23. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
4 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
5 2859, WHB 2067 on February 4, 2025. See **Exhibit A** to Defendants' Motion for Entry of
6 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
7 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
8 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
9 Vartain at paragraph 37, attaching **Exhibit 25**.

11 24. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
12 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
13 2860, WHB 2069 on February 4, 2025. See **Exhibit A** to Defendants' Motion for Entry of
14 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
15 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
16 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
17 Vartain at paragraph 37, attaching **Exhibit 25**.

19 25. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
20 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
21 2862, WHB 2071 on February 4, 2025. See **Exhibit A** to Defendants' Motion for Entry of
22 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
23 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
24 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
25 Vartain at paragraph 37, attaching **Exhibit 25**.

1 26. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
2 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
3 2866, WHB 2072 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
4 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
5 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
6 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
7 Vartain at paragraph 37, attaching **Exhibit 25**.

9 27. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
10 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
11 2867, WHB 2076 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
12 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
13 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
14 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
15 Vartain at paragraph 37, attaching **Exhibit 25**.

17 28. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
18 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
19 2869, WHB 2078 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
20 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
21 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
22 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
23 Vartain at paragraph 37, attaching **Exhibit 25**.

25 29. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
26 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
27 2872, WHB 2081 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
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(1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

30. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID

2872, WHB 2081 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of

(1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

31. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID

2874, WHB 2082 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of

(1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

32. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID

2876, WHB 2084 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of

(1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order

Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

33. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID 2877, WHB 2085 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

34. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID 2878, WHB 2036 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

35. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID 2880, WHB 2038 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

36. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID

1 2884, WHB 2042 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
2 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
3 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
4 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
5 Vartain at paragraph 37, attaching **Exhibit 25**.

6 37. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
7 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID

8 2885, WHB 2043 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
9 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
10 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
11 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
12 Vartain at paragraph 37, attaching **Exhibit 25**.

13 38. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
14 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID

15 2887, WHB 2037 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
16 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
17 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
18 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
19 Vartain at paragraph 37, attaching **Exhibit 25**.

20 39. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
21 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID

22 2888, WHB 2044 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
23 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
24 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
25 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
26 Vartain at paragraph 37, attaching **Exhibit 25**.

1 40. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
2 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
3 2890, WHB 2046 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
4 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
5 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
6 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
7 Vartain at paragraph 37, attaching **Exhibit 25**.
8

9 41. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
10 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
11 2892, WHB 2048 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
12 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
13 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
14 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
15 Vartain at paragraph 37, attaching **Exhibit 25**.
16

17 42. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
18 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
19 2896, WHB 2051 on February 6, 2025. See **Exhibit A** to Defendants' Motion for Entry of
20 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
21 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
22 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
23 Vartain at paragraph 37, attaching **Exhibit 25**.
24

25 43. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
26 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
27 2898, WHB 2052 on February 6, 2025. See **Exhibit A** to Defendants' Motion for Entry of
28

(1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

44. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID 2899, WHB 2053 on February 6, 2025. See **Exhibit A** to Defendants' Motion for Entry of

(1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

45. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID 2900, WHB 2054 on February 6, 2025. See **Exhibit A** to Defendants' Motion for Entry of

(1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura Vartain at paragraph 37, attaching **Exhibit 25**.

46. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride receipt is not available by producing an Uber Ride Information Form for Plaintiff ID 2878, WHB 2036 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of

(1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order

1 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
2 Vartain at paragraph 37, attaching **Exhibit 25**.

3 47. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
4 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
5 2903, WHB 2056 on February 6, 2025. See **Exhibit A** to Defendants' Motion for Entry of
6 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
7 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
8 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
9 Vartain at paragraph 37, attaching **Exhibit 25**.

11 48. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
12 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
13 2904, WHB 2057 on February 5, 2025. See **Exhibit A** to Defendants' Motion for Entry of
14 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
15 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
16 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
17 Vartain at paragraph 37, attaching **Exhibit 25**.

19 49. Counsel disclosed the information required in PTO 5 and PTO 10 for cases in which a ride
20 receipt is not available by producing an Uber Ride Information Form for Plaintiff ID
21 2906, WHB 2059 on February 6, 2025. See **Exhibit A** to Defendants' Motion for Entry of
22 (1) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
23 Receipts Should Not Be Dismissed With Prejudice and (2) A Case Management Order
24 Addressing Certain Plaintiffs Who Have Not Submitted Receipts, Declaration of Laura
25 Vartain at paragraph 37, attaching **Exhibit 25**.

1 50. I declare under penalty of perjury that the foregoing is true and correct, and that this
2 declaration was executed on August 27, 2025 in Houston, Texas.

3
4 Dated: August 27, 2025

/s/ Walt Cubberly

Walt Cubberly

Attorneys for Plaintiff